Gideon A. Schor (GS-5932)

WILSON SONSINI GOODRICH & ROSATI

PROFESSIONAL CORPORATION

1301 Avenue of the Americas, 40th Floor

New York, New York 10019

Tel: (212) 999-5800 Fax: (212) 999-5899

Boris Feldman

Ignacio E. Salceda

WILSON SONSINI GOODRICH & ROSATI

PROFESSIONAL CORPORATION

650 Page Mill Road

Palo Alto, California 94304-1050

Tel: (650) 493-9300 Fax: (650) 493-6811

Attorneys for Defendants

Limelight Networks, Inc., Jeffrey W. Lunsford,

Matthew Hale, Walter D. Amaral, Joseph H.

Gleberman, Michael M. Gordon, Frederic W. Harman,

Mark A. Jung, Allan M. Kaplan, Peter J. Perrone,

David C. Peterschmidt, Nathan F. Raciborski, William H.

Rinehart, and Gary Valenzuela

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Faisal Mustafa, Individually and On Behalf of All ) Those Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Goldman Sachs & Co., Morgan Stanley & Co., Inc., Jeffrey Lunsford, Nathan Raciborski, Allan M. Kaplan, Joseph H. Gleberman, and Peter J. Perrone,

Defendants.

Hendo Weernink, Individually and On Behalf of All Those Similarly Situated,

Plaintiff,

VS.

**ECF CASE** 

Civ. No. 07-CV-7205 (PAC)

NOTICE OF MOTION FOR ADMISSION PRO HAC VICE OF IGNACIO E. SALCEDA

**ECF CASE** 

Limelight Networks, Inc., Goldman Sachs & Co., Morgan Stanley & Co., Inc., Jefferies & Company, Inc., Piper Jaffray & Co., Friedman, Billings, Ramsey, & Co., Inc., Jeffrey Lunsford, Matthew Hale, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Nathan F. Raciborski, and Gary Valenzuela.

## Defendants.

Scott Kairalla, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Michael M. Gordon, William H. Rinehart, Matthew Hale, Nathan F. Raciborski, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela, Goldman Sachs & Co., Jefferies & Company, Inc., Morgan Stanley & Co., Incorporated, Piper Jaffray & Co., and Friedman, Billings, Ramsey, & Co., Inc.,

#### Defendants.

Tim Radecki, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Allan M. Kaplan, Joseph H. Gleberman, Peter J. Perrone, Goldman, Sachs & Co., Morgan Stanley & Co. Incorporated,

Defendants.

Benjamin Paul, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

**ECF CASE** 

Civ. No. 07-CIV-7417 (PAC)

**ECF CASE** 

Civ. No. 07-CIV-7394 (PAC)

**ECF CASE** 

VS.

Limelight Networks, Inc.; Goldman Sachs & Co.;
Morgan Stanley & Co., Inc.; Jeffrey W.
Lunsford; Nathan F. Raciborski; and Allan M.
Kaplan,

Defendants.

Alice Artis, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Michael M. Gordon, William H. Rinehart, Allan M. Kaplan, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela, Goldman, Sachs & Co., Morgan Stanley & Co., Inc., Jefferies & Company, Inc., Piper Jaffray & Co., and Friedman, Billings, Ramsey, & Co., Inc.,

Defendants.

**ECF CASE** 

Civ. No. 07-CIV-7475 (PAC)

PLEASE TAKE NOTICE that upon the annexed declaration of Gideon A. Schor and all exhibits appended thereto, defendants Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Walter D. Amaral, Joseph H. Gleberman, Michael M. Gordon, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Nathan F. Raciborski, William H. Rinehart and Gary Valenzuela (the "Limelight Defendants") will move this Court before the Honorable Paul A. Crotty at the United States Courthouse for the Southern District of New York, for an order pursuant to Local Civil Rule 1.3 admitting Ignacio E. Salceda, a member of the law firm of Wilson Sonsini Goodrich & Rosati, Professional Corporation, and a member in good standing of the Bar of the State of California, to appear *pro hac vice* in the above-captioned action on behalf of the Limelight Defendants. There are no pending disciplinary proceedings against Mr. Salceda in any state or federal court.

Dated: September 21, 2007 WILSON SONSINI GOODRICH & ROSATI Professional Corporation

Gideon A. Schor (GS-5932)

WILSON SONSINI GOODRICH & ROSATI

Professional Corporation

1301 Avenue of the Americas

40th Floor

New York, New York 10019-6022

Telephone: (212) 999-5800 Facsimile: (212) 999-5899

Boris Feldman Ignacio Salceda

WILSON SONSINI GOODRICH & ROSATI

Professional Corporation 650 Page Mill Road Palo Alto, CA 94304-1050

Telephone: (650) 493-9300 Facsimile: (650) 565-5100

Attorneys for Defendants Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Walter D. Amaral, Joseph H. Gleberman, Michael M. Gordon, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Nathan F. Raciborski, William H. Rinehart, and Gary Valenzuela

Gideon A. Schor (GS-5932) WILSON SONSINI GOODRICH & ROSATI PROFESSIONAL CORPORATION 1301 Avenue of the Americas, 40<sup>th</sup> Floor New York, New York 10019

Tel: (212) 999-5800 Fax: (212) 999-5899

Boris Feldman
Ignacio E. Salceda
WILSON SONSINI GOODRICH & ROSATI
PROFESSIONAL CORPORATION
650 Page Mill Road
Palo Alto, California 94304-1050

Tel: (650) 493-9300 Fax: (650) 493-6811

Attorneys for Defendants
Limelight Networks, Inc., Jeffrey W. Lunsford,
Matthew Hale, Walter D. Amaral, Joseph H.
Gleberman, Michael M. Gordon, Frederic W. Harman,
Mark A. Jung, Allan M. Kaplan, Peter J. Perrone,
David C. Peterschmidt, Nathan F. Raciborski, William H.
Rinehart, and Gary Valenzuela

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Faisal Mustafa, Individually and On Behalf of All ) Those Similarly Situated, )	ECF CASE  Civ. No. 07-CV-7205 (PAC)
Plaintiff,	
vs.  Limelight Networks, Inc., Goldman Sachs & Co., Morgan Stanley & Co., Inc., Jeffrey Lunsford, Nathan Raciborski, Allan M. Kaplan, Joseph H. Gleberman, and Peter J. Perrone,	DECLARATION OF GIDEON A. SCHOR IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE OF IGNACIO E. SALCEDA
Defendants. )	
Hendo Weernink, Individually and On Behalf of All Those Similarly Situated,	ECF CASE Civ. No. 07-CIV-7404 (PAC)
Plaintiff,	Civ. No. 07-Civ-7404 (FAC)
vs. )	

Limelight Networks, Inc., Goldman Sachs & Co., Morgan Stanley & Co., Inc., Jefferies & Company, Inc., Piper Jaffray & Co., Friedman, Billings, Ramsey, & Co., Inc., Jeffrey Lunsford, Matthew Hale, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Nathan F. Raciborski, and Gary Valenzuela,

## Defendants.

Scott Kairalla, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Michael M. Gordon, William H. Rinehart, Matthew Hale, Nathan F. Raciborski, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela, Goldman Sachs & Co., Jefferies & Company, Inc., Morgan Stanley & Co., Incorporated, Piper Jaffray & Co., and Friedman, Billings, Ramsey, & Co., Inc.,

## Defendants.

Tim Radecki, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Allan M. Kaplan, Joseph H. Gleberman, Peter J. Perrone, Goldman, Sachs & Co., Morgan Stanley & Co. Incorporated,

#### Defendants.

Benjamin Paul, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

**ECF CASE** 

Civ. No. 07-CIV-7417 (PAC)

**ECF CASE** 

Civ. No. 07-CIV-7394 (PAC)

**ECF CASE** 

Limelight Networks, Inc.; Goldman Sachs & Co.; Morgan Stanley & Co., Inc.; Jeffrey W. Lunsford; Nathan F. Raciborski; and Allan M. Kaplan,

#### Defendants.

Alice Artis, Individually and On Behalf of All Others Similarly Situated,

## Plaintiff,

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Michael M. Gordon, William H. Rinehart, Allan M. Kaplan, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela, Goldman, Sachs & Co., Morgan Stanley & Co., Inc., Jefferies & Company, Inc., Piper Jaffray & Co., and Friedman, Billings, Ramsey, & Co., Inc.,

Defendants.

## **ECF CASE**

- I, Gideon A. Schor, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:
- 1. I am a member of the law firm of Wilson Sonsini Goodrich & Rosati,
  Professional Corporation, attorneys for defendants Limelight Networks, Inc., Jeffrey W.
  Lunsford, Matthew Hale, Walter D. Amaral, Joseph H. Gleberman, Michael M. Gordon,
  Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C.
  Peterschmidt, Nathan F. Raciborski, William H. Rinehart and Gary Valenzuela (the
  "Limelight Defendants") in the above-captioned action. I was admitted to practice before
  this court on June 5, 1990.
- 2. I submit this declaration in support of the Limelight Defendants' motion for the admission *pro hac vice* of Ignacio E. Salceda.

- Mr. Salceda is a member of the law firm of Wilson Sonsini Goodrich & 3. Rosati, Professional Corporation, in Palo Alto, California, and, upon information and belief, is a member in good standing of the bar of the State of California.
- 4. Attached hereto as Exhibit A is a Certificate of Good Standing for Mr. Salceda from the State Bar of California, issued within thirty days of this Declaration.
- 5. The Limelight Defendants respectfully request that Ignacio E. Salceda be granted admission pro hac vice in this action.

I declare under penalty of perjury that the foregoing is true and correct.

Date: September 21, 2007

# **EXHIBIT A**

#### MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

September 13, 2007

## TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, IGNACIO EVARISTO SALCEDA, #164017 was admitted to the practice of law in this state by the Supreme Court of California on April 15, 1993; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

Kath Lambert

Custodian of Membership Records

Gideon A. Schor (GS-5932)
WILSON SONSINI GOODRICH & ROSATI
PROFESSIONAL CORPORATION
1301 Avenue of the Americas, 40<sup>th</sup> Floor

New York, New York 10019 Tel: (212) 999-5800

Tel: (212) 999-5800 Fax: (212) 999-5899

Boris Feldman
Ignacio E. Salceda
WILSON SONSINI GOODRICH & ROSATI
PROFESSIONAL CORPORATION
650 Page Mill Road
Palo Alto, California 94304-1050
Tel: (650) 493,9300

Tel: (650) 493-9300 Fax: (650) 493-6811

VS.

Attorneys for Defendants
Limelight Networks, Inc., Jeffrey W. Lunsford,
Matthew Hale, Walter D. Amaral, Joseph H.
Gleberman, Michael M. Gordon, Frederic W. Harman,
Mark A. Jung, Allan M. Kaplan, Peter J. Perrone,
David C. Peterschmidt, Nathan F. Raciborski, William H.
Rinehart, and Gary Valenzuela

# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Faisal Mustafa, Individually and On Behalf of All ) **ECF CASE** Those Similarly Situated, Civ. No. 07-CV-7205 (PAC) Plaintiff, VS. Limelight Networks, Inc., Goldman Sachs & Co., Morgan Stanley & Co., Inc., Jeffrey Lunsford, Nathan Raciborski, Allan M. Kaplan, Joseph H. Gleberman, and Peter J. Perrone, Defendants. Hendo Weernink, Individually and On Behalf of **ECF CASE** All Those Similarly Situated, Civ. No. 07-CIV-7404 (PAC) Plaintiff,

Limelight Networks, Inc., Goldman Sachs & Co., Morgan Stanley & Co., Inc., Jefferies & Company, Inc., Piper Jaffray & Co., Friedman, Billings, Ramsey, & Co., Inc., Jeffrey Lunsford, Matthew Hale, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Nathan F. Raciborski, and Gary Valenzuela,

#### Defendants.

Scott Kairalla, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Michael M. Gordon, William H. Rinehart, Matthew Hale, Nathan F. Raciborski, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela, Goldman Sachs & Co., Jefferies & Company, Inc., Morgan Stanley & Co., Incorporated, Piper Jaffray & Co., and Friedman, Billings, Ramsey, & Co., Inc.,

#### Defendants.

Tim Radecki, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Allan M. Kaplan, Joseph H. Gleberman, Peter J. Perrone, Goldman, Sachs & Co., Morgan Stanley & Co. Incorporated,

#### Defendants.

Benjamin Paul, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

**ECF CASE** 

Civ. No. 07-CIV-7417 (PAC)

**ECF CASE** 

Civ. No. 07-CIV-7394 (PAC)

**ECF CASE** 

VS. Limelight Networks, Inc.; Goldman Sachs & Co.; Morgan Stanley & Co., Inc.; Jeffrey W. Lunsford; Nathan F. Raciborski; and Allan M. Kaplan, Defendants. Alice Artis, Individually and On Behalf of All **ECF CASE** Others Similarly Situated, Civ. No. 07-CIV-7475 (PAC) Plaintiff, VS. Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Michael M. Gordon, William H. Rinehart, Allan M. Kaplan, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela, Goldman, Sachs & Co., Morgan Stanley & Co., Inc., Jefferies & Company, Inc., Piper Jaffray & Co., and Friedman, Billings, Ramsey, & Co., Inc.,

## **CERTIFICATE OF SERVICE**

I hereby certify that on September 21, 2007, I caused a true and correct copy of the Motion for Pro Hac Vice Admission of Ignacio E. Salceda to be served by USPS First Class delivery on:

Alan S. Goudiss Shearman & Sterling LLP 599 Lexington Avenue New York, NY 10022

Defendants.

David A. Rosenfeld Coughlin Stoia Geller Rudman & Robbins LLP 58 South Service Road, Suite 200 Melville, NY 11747

Evan J. Smith Brodsky & Smith LLC 240 Mineola Boulevard Mineola, NY 11501

Jeffrey A. Klafter Klafter & Olsen LLP 1311 Mamaroneck Avenue, Suite 220 White Plains, NY 10605

Laurence D. Paskowitz, Esq. Paskowitz & Associates 60 East 42<sup>nd</sup> Street, 46<sup>th</sup> Floor New York, NY 10165

Lawrence Rosen The Rosen Law Firm, P.A. 350 Fifth Avenue, Suite 5508 New York, NY 10118

Gregory M. Nespole Wolf Haldenstein Adler Freeman & Herz LLP 270 Madison Avenue White Plains, NY 10016

D. Seamus Kaskela Schiffrin Barroway Topaz & Kessler LLP 280 King of Prussia Road Radnor, PA 19087

Roy L. Jacobs, Esq. Roy Jacobs & Associates 60 East 42<sup>nd</sup> Street, 46<sup>th</sup> Floor New York, NY 10165

Vacil Jancha

Gideon A. Schor (GS-5932)

WILSON SONSINI GOODRICH & ROSATI

PROFESSIONAL CORPORATION

1301 Avenue of the Americas, 40<sup>th</sup> Floor

New York, New York 10019

Tel: (212) 999-5800 Fax: (212) 999-5899

Boris Feldman

Ignacio E. Salceda

WILSON SONSINI GOODRICH & ROSATI

PROFESSIONAL CORPORATION

650 Page Mill Road

Palo Alto, California 94304-1050

Tel: (650) 493-9300 Fax: (650) 493-6811

Attorneys for Defendants

Limelight Networks, Inc., Jeffrey W. Lunsford,

Matthew Hale, Walter D. Amaral, Joseph H.

Gleberman, Michael M. Gordon, Frederic W. Harman,

Mark A. Jung, Allan M. Kaplan, Peter J. Perrone,

David C. Peterschmidt, Nathan F. Raciborski, William H.

Rinehart, and Gary Valenzuela

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

Faisal Mustafa, Individually and On Behalf of All ) Those Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Goldman Sachs & Co., Morgan Stanley & Co., Inc., Jeffrey Lunsford, Nathan Raciborski, Allan M. Kaplan, Joseph H. Gleberman, and Peter J. Perrone,

Defendants.

Hendo Weernink, Individually and On Behalf of All Those Similarly Situated,

Plaintiff,

VS.

ECF CASE

Civ. No. 07-CV-7205 (PAC)

ORDER GRANTING MOTION FOR ADMISSION PRO HAC VICE OF IGNACIO E. SALCEDA

ECF CASE

Document 6

Limelight Networks, Inc., Goldman Sachs & Co., Morgan Stanley & Co., Inc., Jefferies & Company, Inc., Piper Jaffray & Co., Friedman, Billings, Ramsey, & Co., Inc., Jeffrey Lunsford, Matthew Hale, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Nathan F. Raciborski, and Gary Valenzuela,

### Defendants.

Scott Kairalla, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Michael M. Gordon, William H. Rinehart, Matthew Hale, Nathan F. Raciborski, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela, Goldman Sachs & Co., Jefferies & Company, Inc., Morgan Stanley & Co., Incorporated, Piper Jaffray & Co., and Friedman, Billings, Ramsey, & Co., Inc.,

## Defendants.

Tim Radecki, Individually and On Behalf of All Others Similarly Situated,

Plaintiff.

VS.

Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Allan M. Kaplan, Joseph H. Gleberman, Peter J. Perrone, Goldman, Sachs & Co., Morgan Stanley & Co. Incorporated,

Defendants.

Benjamin Paul, Individually and On Behalf of All Others Similarly Situated,

Plaintiff,

**ECF CASE** 

Civ. No. 07-CIV-7417 (PAC)

**ECF CASE** 

Civ. No. 07-CIV-7394 (PAC)

**ECF CASE** 

VS.	)
Limelight Networks, Inc.; Goldman Sachs & Co.; Morgan Stanley & Co., Inc.; Jeffrey W. Lunsford; Nathan F. Raciborski; and Allan M. Kaplan,	) ) ) . ) .
Defendants.	
Alice Artis, Individually and On Behalf of All Others Similarly Situated,	)
Plaintiff,	)
VS.	)
Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Nathan F. Raciborski, Michael M. Gordon, William H. Rinehart, Allan M. Kaplan, Walter D. Amaral, Joseph H. Gleberman, Frederic W. Harman, Mark A. Jung, Peter J. Perrone, David C. Peterschmidt, Gary Valenzuela, Goldman, Sachs & Co., Morgan Stanley & Co., Inc., Jefferies & Company, Inc., Piper Jaffray & Co., and Friedman, Billings, Ramsey, & Co., Inc.,	
Defendants.	<u> </u>

THIS MATTER having been brought before the Court by defendants Limelight Networks, Inc., Jeffrey W. Lunsford, Matthew Hale, Walter D. Amaral, Joseph H. Gleberman, Michael M. Gordon, Frederic W. Harman, Mark A. Jung, Allan M. Kaplan, Peter J. Perrone, David C. Peterschmidt, Nathan F. Raciborski, William H. Rinehart and Gary Valenzuela (the "Limelight Defendants") for an order pursuant to Local Civil Rule 1.3 admitting Ignacio E. Salceda to appear and participate *pro hac vice* in this action on behalf of the Limelight Defendants, and for good cause shown;

IT IS on this day of , 2007;

ORDERED that Ignacio E. Salceda, being a member in good standing of the bar of the State of California, be permitted to appear *pro hac vice* in the above-captioned matter.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Honorable Paul A. Crotty United States District Judge